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18 *pro hac vice pending

19 Attorneys for Defendants
20 ALLIANCE ABROAD GROUP, LC; ALLIANCE
21 ABROAD GROUP INTERNATIONAL, LLC AND
22 ALLIANCE ABROAD GP, LLC

23 UNITED STATES DISTRICT COURT
24 DISTRICT OF NEVADA

25 MELANIE MALINGIN,
26
27 Plaintiff,

28 vs.

ALLIANCE ABROAD GROUP, LP;
ALLIANCE ABROAD GROUP
INTERNATIONAL, LLC; ALLIANCE
ABROAD GP, LLC; CLARK COUNTY
SCHOOL DISTRICT; DOES 1-10; AND ROE
CORPORATIONS 11-20, INCLUSIVE,
Defendant

Case No.: 2:19-cv-01812-RFB-NJK

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
PLAINTIFF'S OPPOSITION TO
DEFENDANT'S MOTION TO DISMISS
AND COMPEL ARBITRATION (ECF
NO. 20)**

(FIRST REQUEST)

IT IS HEREBY STIPULATED AND AGREED between counsel for Plaintiff Melanie
Malingin ("Plaintiff") and Defendant Alliance Abroad Group, LP, Defendant Alliance Abroad

1 Group International, LLC and Defendant Alliance Abroad GP, LLC (“Defendants” or “Alliance”)
2 as follows:

3 **WHEREAS**, on or about September 23, 2019, Plaintiff filed in the Eighth Judicial District
4 Court a Complaint (the “Complaint”), which was assigned Case No. A-19-802399-C (the
5 “Lawsuit”);

6 **WHEREAS**, on or about October 3, 2019, Plaintiff served Alliance with the Complaint;

7 **WHEREAS**, Defendant Clark County School District filed a Notice of Removal with the
8 United States District Court, District of Nevada (ECF No. 1);

9 **WHEREAS**, Defendants’ Alliance filed its Motion to Dismiss and Compel Arbitration
10 (the “Motion to Dismiss”, ECF No. 9) on or about October 23, 2019;

11 **WHEREAS**, Defendant’s responsive pleading originally due on November 6, 2019, was
12 extended via a stipulation and order between the parties for fourteen (14) days through November
13 20, 2019, for Plaintiff to respond to the Motion to Dismiss;

14 **WHEREAS**, on or about November 20, 2019, Plaintiff filed in the Eighth Judicial District
15 Court the Plaintiff’s Response in Opposition to Defendants’ Motion to Dismiss and Compel
16 Arbitration (the “Opposition”);

17 **WHEREAS**, Defendants’ reply brief is currently due by November 27, 2019;

18 **WHEREAS**, due to scheduling conflicts, the Parties agree to an additional fourteen (14)
19 day extension through December 6, 2019, for Plaintiff to respond to the Motion to Dismiss; and,
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1 **WHEREAS**, this is the first request for an extension regarding the filing of Defendants'
2 response to Plaintiff's Opposition to Defendants' Motion to Dismiss, which is made in good faith,
3 not for purposes of delay, and neither party is prejudiced by this extension.

4 Dated: November 26, 2019

5 Respectfully submitted,

6 By: /s/ Christian Gabroy

7 Christian Gabroy, Esq.

8 District at Green Valley Ranch

9 The District at Green Valley Ranch

10 170 South Green Valley Parkway,

11 Suite 280

12 Henderson, Nevada 89012

13 Fax: (702) 259-7704

14 Attorneys for Plaintiff

Dated: November 26, 2019

Respectfully submitted,

By: /s/ Brittany Woodman

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Attorneys for Defendants

ALLIANCE ABROAD GROUP, LC; ALLIANCE

ABROAD GROUP INTERNATIONAL, LLC

AND ALLIANCE ABROAD GP, LLC

*pro hac vice pending

IT IS SO ORDERED.



RICHARD F. BOULWARE, II

UNITED STATES DISTRICT JUDGE

DATED this 26th day of November, 2019.

